

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

JOHN NOAKES

Plaintiff,

v.

CASE WESTERN RESERVE  
UNIVERSITY, ET AL

Defendants

Case No. **1:21-cv-01776**

Judge:

AFFIDAVIT OF [REDACTED].

1. I am a medical student at the Case Western Reserve University School of Medicine. I am a classmate of John Noakes. (I am using his pseudonym to avoid further embarrassment and damage to his reputation). As a student, I am requesting that counsel redact my name before filing because I fear retaliation and harassment by both administrators at CWRU and fellow students.
2. I am familiar with the allegations surrounding John Noakes. I am aware that John Noakes in fall 2020, John Noakes was accused of sexual misconduct by another student. CWRU investigated the matter and, following a hearing, John Noakes was cleared of all charges. I am aware that administrators have engaged in a retaliatory campaign of intimidation and harassment against John Doe as a result.
3. I am aware that CWRU officials were unhappy with the outcome. CWRU officials, as a result of allegations of sexual assault and sexual harassment on campus, try very hard to “believe victims.” I do not disagree with this sentiment, but also believe that CWRU administrators must respect the result of their own Title IX process.
4. I am familiar with the fact that John Noakes, after he was cleared of charges, posted on a GroupMe group chat used by the Medical School, “All glory and honor to the Most High, who is my refuge

and fortress. That's all, thanks" and changed his name to "[John Noakes] (1-0)." I am aware that John Noakes was subjected to investigations and disciplinary action by the Medical School's Committee on Students ("COS") as a result of these posts.

5. I have seen worse things from students go by without any mention by the COS. I believe that this process was aimed at finding another way to punish John Noakes in order to appease certain vocal students at the Medical School. Students at the Medical School have expressed the belief that John Noakes must be guilty and that fact that he was found "not responsible" is proof that the Title IX process is flawed. Students have sought to exclude John Noakes from group projects and circulated a petition seeking his removal from the school.
6. I, along with many of my fellow students, am distressed to learn that CWRU administrators told John Noakes to "watch himself," tried to coerce him to take a year off, and threatened him if he pursued Title IX complaints against fellow students or retaliation complaints against administrators. Statements such as "You're digging yourself a hole, honey" and "I can't protect you" from CWRU faculty and administrators can only be interpreted as threats – and we hear those threats loud and clear.

7. Medical students are not willing to risk a review by the COS. Such a review can have a significant adverse impact on the career of a medical student. The COS process risks damaging a student's chances to obtain a residency through the match program following medical school. As a result, the threat of being forced to appear before the COS is likely to deter other CWRU students from complaining about the CWRU Title IX process, defending themselves in a Title IX process, or challenging retaliatory actions. Few students are likely to risk doing anything that might result in a review by the COS, as such a review could result in adverse sanctions ranging from counseling to expulsion.

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of September 2021.

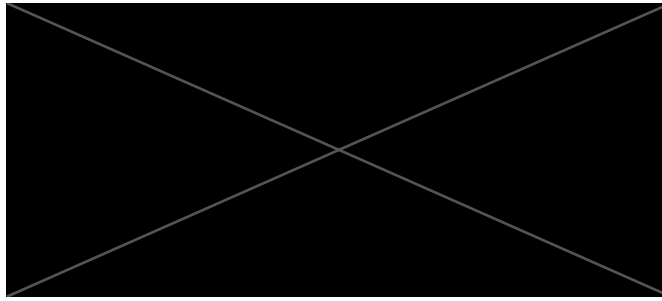
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[REDACTED]